INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

January 12, 2004

TO: Interested Parties / Applicant

RE: Ken-Koat, Inc. / SSM 069-18000-00018

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

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January 12, 2004

Ms. Linda M. Snyder
Ken-Koat, Inc.
P.O. Box 2668
Lewisburg, TN 37091

Re: **069-18000**
Significant Source Modification to:
Part 70 Operating Permit No.: **T 069-7676-00018**

Dear Ms. Snyder:

Ken-Koat, Inc. was issued Part 70 Operating Permit (T 069-7676-00018) on July 9, 1999, for a metal coating source. An application to modify the source was received on September 18, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(b) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(c) One (1) insignificant phosphate cleaning line.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments (TSD and Changed Permit Pages)
CAP/MES
cc: File - Huntington County
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Branch - Karen Ampil
Administrative and Development

Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Ken-Koat, Inc.
1605 Riverfork Drive East
Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 069-7676-00018	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 9, 1999 Expiration Date: July 9, 2004

First Administrative Amendment 069-13557-00018, issued on December 13, 2000
First Significant Source Modification 069-12898-00018, issued on May 9, 2001
Second Administrative Amendment No. 069-12991-00018, issued on May 10, 2001
First Reopening No. 069-13321-00018, issued on January 29, 2002

First Significant Source Modification No.: 069-18000-00018	Conditions affected: A.2, A.3, D.2.1, D.2.2, D.2.3, D.2.8, D.2.10, and Section D.7 and a report form are added
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 12, 2004

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*As of January 1, 2001, the name of the Office of Air Management (OAM) has been changed to the Office of Air Quality (OAQ). All references to Office of Air Management (OAM) should be read as Office of Air Quality (OAQ).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
C.10 Compliance Schedule [326 IAC 2-7-6(3)]
C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
C.13 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.19 Monitoring Data Availability [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)]
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C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
D.5.4 New Source Toxics Control [326 IAC 2-1-3.4]
D.5.5 PSD Modification [326 IAC 2-2] [40 CFR 52.21]
D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary metal coating operation.

Responsible Official:	Chris Robertson
Source Address:	1605 Riverfork Drive, Huntington, Indiana 46750
Mailing Address:	PO Box 1027, Huntington, Indiana 46750
SIC Code:	3479
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(c) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 12.00 pounds per hour, which exhausts to a stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 8.20 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3..

(d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(f) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

(g) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.

(h) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as #C2.

(i) Two (2) HVLP chain on edge machines, designated as COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.

(j) One (1) HVLP chain on edge machine, designated as COE-5, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater which exhausts to one (1) stack designated as C3.

(k) One (1) chain on edge machine, identified as COE-6, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by a thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) One (1) electric heater.

(l) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(m) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas boiler with a maximum heat input capacity of 5.23 million Btu per hour.

(2) One (1) burn-off oven, designated as BURN, maximum heat input capacity of 1 million Btu per hour, ventilated to an afterburner with 90% control efficiency, which exhausts to one (1) stack designated as C4.

(3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400F.

(b) Infrared cure equipment.

(c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day; Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(1) Two (2) hand painting operations for metal inserts, designated as HPO1 and HPO2, each with a maximum adhesive application rate of 1.04 pounds per hour, coated by either brushes or a small dip pot, which exhausts indoors as fugitive VOC emissions.

(2) Three (3) phosphate cleaning lines, consisting of a series of washes and rinses, which exhausts to one (1) stack designated as S-26.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(c) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(i) Two (2) HVLP chain on edge machines, designated as COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.

(b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2).

Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating in pounds per gallon of solids delivered to any of the facilities listed above in Section D.2 (DC-1, RCP, COE-3 and COE-4) and the facilities listed in Section D.1 (DC-2) and COE-5 listed in Section D.5 shall be limited to 85.5. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) The input of VOC to DC-1, RCP, COE-3, and COE-4 and the usage of cleanup solvent for DC-1, RCP, COE-3, and COE-4 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to 2564 tons used per twelve (12) consecutive months period. This limitation will prevent the VOC emissions from DC-1, RCP, COE-3, and COE-4 from being greater than 200 tons per twelve (12) consecutive month period. This limitation is based upon the use of a control device with an overall control efficiency of 92.2%.

(e) The input of VOC including cleanup solvent, minus the VOC solvent shipped out delivered to the applicators of SB-1, SB-2, SB-3 and SB-4 shall each be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(f) The input VOC of DS-1 shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

D.2.2 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facilities in Section D.2 (DC-1, DS-1, RCP, SB-1 - SB-4, COE-3 and COE-4), and Section D.4 (DG) shall be limited to less than 250 tons per twelve (12) consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) HVLP spray booths, the two (2) chain on edge machines and the ransburg coating process shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DC-1, SB-1 - SB-4, RCP, COE-3 and COE-4 and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of SSM 069-12898-00018, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the four (4) HVLP spray booths (SB-1 - SB-4), the two (2) chain on edge machines (COE-3 and COE-4) and the ransburg coating process (RCP) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Recuperative Thermal Oxidizer Operations

(a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum overall VOC control efficiency of 92.2%. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Condition D.2.1, when DC-1, RCP, COE-3 and COE-4 are in operation.

(b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.

(1) This device shall have an accuracy of ± 2.5?C or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.

(c) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAM before such change may occur.

D.2.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-6, S-10, S-11, and C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Condition D.2.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The daily volume weighted VOC content of the coatings as applied on days when a coating with a VOC content greater than 85.5 pounds of VOC per gallon of solids is used;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The total HAPs usage for each month; and

(7) Monthly emissions in pounds of VOC and HAPs.

(b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(l) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(m) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$E = L / (1 - (L/D))$

Where

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D = Density of VOC in coating in pounds per gallon of VOC;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 7.70.

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 88.6%.

D.7.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the two (2) chain on edge machines (COE-7 and COE-8) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.7.3 PSD Minor Limit [326 IAC 2-2]

(a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities shall use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. Thus, the potential to emit VOC is limited to less than 40 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable.

(b) Any change or modification that increases the solids delivered to the applicators to 750 tons per twelve (12) consecutive month period or more shall increase the potential to emit PM_{10} to 15 tons per year, based on a transfer efficiency of 60% and a control efficiency of 95%, and shall require prior IDEM, OAQ, approval. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

D.7.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The Permittee shall operate the thermal oxidizer at all times when either of the two (2) chain on edge machines (COE-7 or COE-8) are in operation. This in conjunction with Condition D.7.1(d) shall make the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, not applicable pursuant to 326 IAC 2-4.1-1 and 40 CFR 63.41.

D.7.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing process shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.7.6 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.7.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.7.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this

permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.7.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.7.1, D.7.3 and D.7.4.

D.7.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.7.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.7.11 VOC Emissions

Compliance with Condition D.7.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compounds emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)] + [uncontrolled VOC input]

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.7.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400?F. An hourly average temperature that is below 1400?F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1, D.7.3 and D.7.4, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.13 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1, D.7.3 and D.7.4, as

approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.15 Record Keeping Requirements

(a) To document compliance with Conditions D.7.1 and D.7.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.7.1 and D.7.3.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage;

(4) The total VOC usage for each month;

(5) To document compliance with Condition D.7.12, the continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test; and

(6) To document compliance with Condition D.7.13, daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.7.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.7.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.16 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.7.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.7.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Ken-Koat, Inc.
Source Address: 1605 Riverfork Drive, Huntington, Indiana 46750
Mailing Address: PO Box 1027, Huntington, Indiana 46750
Part 70 Permit No.: T 069-7676-00018
Facility: Two (2) chain on edge machines (COE-7 and COE-8)
Parameter: VOC usage
Limit: No more than 164 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, equivalent to VOC emissions less than 40 tons per year when operating the thermal oxidizer at a control efficiency no less than 75.7%

YEAR: _____

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for Part 70
Significant Source and Significant Permit Modifications

Source Background and Description

Source Name:	**Ken-Koat, Inc.**
Source Location:	**1605 Riverfork Drive, Huntington, Indiana 46750**
County:	**Huntington**
SIC Code:	**3479**
Operation Permit No.:	**T 069-7676-00018**
Operation Permit Issuance Date:	**July 9, 1999**
Significant Source Modification No.:	**069-18000-00018**
Significant Permit Modification No.:	**069-18038-00018**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a modification application from Ken-Koat, Inc. relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(b) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

The applicant is also constructing one (1) additional phosphate cleaning line. The two (2) existing phosphate cleaning lines were determined to be insignificant in the review of T 069-7676-00018, issued on July 9, 1999, and the applicant has indicated that there are no VOC or particulate emissions from the process. There are no rules specifically applicable to these units.

One (1) existing chain on edge machine (COE-1) has been removed from the source and will be removed from the permit. Also, two (2) insignificant aluminum oxide grit blasters, designated as ALOX-2 and ALOX-3, have been removed from the source and will be removed from the permit.

History

On September 18, 2003, Ken-Koat, Inc. submitted an application to the OAQ requesting to add additional chain on edge machines to their existing plant. Ken-Koat, Inc. was issued a Part 70 permit on July 9, 1999. An Administrative Amendment(069-13557-00018) was issued on December 13, 2000, a first Significant Source Modification (069-12898-00018) was issued on May 9, 2001, a second Administrative Amendment (069-12991-00018) was issued on May 10, 2001, and a first Reopening (R 069-13321-00018) was issued on January 29, 2002.

Enforcement Issue

The source has the following enforcement actions pending:

Notice of Violation, Case No. 2002-12218-A, signed June 3, 2003. This notice of violation results from the source not operating the required thermal oxidizer when some facilities were operating, during September 2001, and January, February and October 2002.

Stack Summary

There are no new stacks associated with this modification.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Permit Modifications be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 18, 2003.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	15.0
PM_{10}	15.0
SO_2	-
VOC	164
CO	-
NO_X	-

HAPs	Potential To Emit (tons/year)
MIBK	14.9
Formaldehyde	0.198
MEK	18.6
Ethylbenzene	5.91
Toluene	111
Xylenes	23.6
Lead	11.8
Carbon Tetrachloride	1.18
TOTAL	186

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 326 IAC 2-7-10.5(f)(4)(A) and (D), any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of PM or PM_{10} and any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of VOC. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 069-18038-00018) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment

Pollutant	Status
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Huntington County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 250
PM_{10}	less than 250
SO_2	less than 250
VOC	512
CO	less than 250
NO_X	less than 250

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the limitations in the existing permit.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_X (tons/yr)
Proposed Modification	<15.0	<15.0	-	<40.0	-	-
Contemporaneous Increases	-	-	-	-	-	-
Contemporaneous Decreases	-	-	-	-	-	-
Net Emissions	<15.0	<15.0	-	<40.0	-	-
PSD Significant Level	25	15	40	40	100	40

(a) This modification to an existing major stationary source is not major because the emissions increase is limited to less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) The potential to emit for the proposed facilities are based on the limitations in the permit, which are higher than the calculated potential to emit after controls.

(c) The applicant did not request that contemporaneous decreases from removing the one (1) chain on edge machine (COE-1) be taken into account when determining PSD applicability for this modification. No contemporaneous decreases are required to make this modification minor pursuant to 326 IAC 2-2, PSD.

Federal Rule Applicability

(a) This significant permit modification does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:

(1) with the potential to emit before controls equal to or greater than the major source threshold for VOC;

(2) that is subject to an emission limitation or standard for VOC; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification.

(b) The pollutant-specific emission unit is not a “large unit” as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

(c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(d) This source is subject to the requirements of 40 CFR 63.3880, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal

Parts and Products, which was signed in August 2003, because this proposed facilities coat metal parts at a source that is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs). This source is an existing affected source since some metal parts coating facilities were constructed at this source prior to August 13, 2002. Since this source is an existing affected source, the facilities at this source must comply with the requirements on and after the date three (3) years after the effective date of 40 CFR Part 63, Subpart MMMM, pursuant to 40 CFR 63.3883(b).

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification is a modification to an existing major source pursuant to 326 IAC 2-2, PSD.

(a) The unrestricted potential VOC emissions are greater than 40 tons per year from this modification. The use of VOC, including coatings, dilution solvents, and cleaning solvents at the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities will be required to use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. The VOC usage limit is equivalent to the maximum potential VOC usage according to the information provided by the applicant. Thus, the potential to emit VOC is limited to less than 40 tons per year (164 x (1 - 0.886) < 40). Therefore, this modification is a minor modification to an existing major source, and the requirements of 326 IAC 2-2, PSD, are not applicable.

(b) The unrestricted potential PM_{10} emissions from this proposed modification are 15.0 tons per year. Operation of the dry filters at all times when the two (2) chain on edge machines are in operation will limit the potential to emit PM_{10} to less than 15.0 tons per year. Therefore, this modification is a minor modification to an existing major source, and the requirements of 326 IAC 2-2, PSD, are not applicable.

(c) The unrestricted potential PM emissions from this proposed modification are less than 25.0 tons per year.

326 IAC 2-4.1-1 (New Source Toxics Control)

The two (2) proposed chain on edge machines are parallel production operations, and therefore, are not considered a single facility. The unrestricted potential HAP emissions from each of the proposed chain on edge machines is greater than 10 tons of any individual HAP and 25 tons of any combination of HAPs. The applicant is required to operate the thermal oxidizer (CE-3) at a control efficiency of 88.6% based on the limitations of 326 IAC 8-2-9 (see below). This will also limit the potential to emit each individual HAP to less than 10 tons per year from each facility, and total HAPs to less than 25 tons per year from each facility. 326 IAC 2-4.1-1 incorporates by reference 40 CFR 64.41, which defines “affected source” as the stationary source or group of stationary sources which, when fabricated (on site), erected, or installed meets the definition of "construct a major source" or the definition of "reconstruct a major source." “Construct a major source” for a developed site is defined as follows:

To fabricate, erect, or install at any developed site a new process or production unit which in and of itself emits or has the potential to emit 10 tons per year of any HAP or 25 tons per year

of any combination of HAP, unless the process or production unit satisfies criteria in paragraphs (2) (i) through (vi) of this definition.

(i) All HAP emitted by the process or production unit that would otherwise be controlled under the requirements of this subpart will be controlled by emission control equipment which was previously installed at the same site as the process or production unit;

(ii) (A) The permitting authority has determined within a period of 5 years prior to the fabrication, erection, or installation of the process or production unit that the existing emission control equipment represented best available control technology (BACT), lowest achievable emission rate (LAER) under 40 CFR part 51 or 52, toxics -- best available control technology (T-BACT), or MACT based on State air toxic rules for the category of pollutants which includes those HAP's to be emitted by the process or production unit; or

(B) The permitting authority determines that the control of HAP emissions provided by the existing equipment will be equivalent to that level of control currently achieved by other well-controlled similar sources (i.e., equivalent to the level of control that would be provided by a current BACT, LAER, T-BACT, or State air toxic rule MACT determination);

(iii) The permitting authority determines that the percent control efficiency for emissions of HAP from all sources to be controlled by the existing control equipment will be equivalent to the percent control efficiency provided by the control equipment prior to the inclusion of the new process or production unit;

(iv) The permitting authority has provided notice and an opportunity for public comment concerning its determination that criteria in paragraphs (2)(i), (2)(ii), and (2)(iii) of this definition apply and concerning the continued adequacy of any prior LAER, BACT, T-BACT, or State air toxic rule MACT determination;

(v) If any commenter has asserted that a prior LAER, BACT, T-BACT, or State air toxic rule MACT determination is no longer adequate, the permitting authority has determined that the level of control required by that prior determination remains adequate; and

(vi) Any emission limitations, work practice requirements, or other terms and conditions upon which the above determinations by the permitting authority are applicable requirements under section 504(a) and either have been incorporated into any existing title V permit for the affected facility or will be incorporated into such permit upon issuance.

These facilities are controlled by an existing thermal oxidizer, that thermal oxidizer was determined to be MACT for the similar production equipment constructed in 1999, the percent control efficiency for the existing units will not be permitted to decrease as a result of the inclusion of the new units, there will be a permit modification for this change, and the approval will be on public notice prior to the change. Therefore, this new construction does not meet the definition of “construct a major source,” and the requirements of 326 IAC 2-4.1-1 are not applicable. In order to make 326 IAC 2-4.1-1 not applicable, the source must operate the thermal oxidizer (CE-3) at all times when the two (2) chain on edge machines (COE-7 and

COE-8) are in operation and maintain a control efficiency of no less than 88.6%.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from each of the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (3.5);
D = Density of VOC in coating in pounds per gallon of VOC (6.42);
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 7.70.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. (67.53)

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied. (7.70)

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 88.6%.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) chain on edge machines (COE-7 and COE-8) have applicable compliance monitoring conditions as specified below:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400?F. An hourly average temperature that is below 1400?F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in the permit, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temp-

erature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in the permit, as approved by IDEM.

(e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(f) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(g) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(h) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the thermal oxidizer and the dry filters for the chain on edge machines must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and 326 IAC 2-7 (Part 70), and to make the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-2 (PSD) not applicable.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(c) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) One (1) coating tank with a maximum topcoat application rate of 12.00 pounds per hour, which exhausts to a stack designated as C3.

(2) One (1) primer tank with a maximum primer application rate of 8.20 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.

(d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(f) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

(g) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.

(h) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as #C2.

(i) ~~Three (3)~~ **Two (2)** HVLP chain on edge machines, designated as ~~COE-1,~~ COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. ~~COE-1 exhausts to two (2) stacks designated as S-12 and S-13.~~

COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.

(j) One (1) HVLP chain on edge machine, designated as COE-5, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.

(3) One (1) electric heater which exhausts to one (1) stack designated as C3.

(k) One (1) chain on edge machine, identified as COE-6, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by a thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) One (1) electric heater.

(l) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(m) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) natural gas boiler with a maximum heat input capacity of 5.23 million Btu per hour.

(2) One (1) burn-off oven, designated as BURN, maximum heat input capacity of 1 million Btu per hour, ventilated to an afterburner with 90% control efficiency, which exhausts to one (1) stack designated as C4.

(3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400F.

(b) Infrared cure equipment.

(c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day; Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(1) Two (2) hand painting operations for metal inserts, designated as HPO1 and HPO2, each with a maximum adhesive application rate of 1.04 pounds per hour, coated by either brushes or a small dip pot, which exhausts indoors as fugitive VOC emissions.

(2) ~~Two (2)~~ **Three (3)** phosphate cleaning lines, consisting of a series of washes and rinses, which exhausts to one (1) stack designated as S-26.

~~(3) Two (2) aluminum oxide grit blasters, designated as ALOX-2 and ALOX-3. The maximum metal insert throughput of ALOX-2 and ALOX-3 is 40 pounds per hour each and exhausts indoors as fugitive PM emissions.~~

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.

(c) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.

(d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:

(1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.

(2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.

(e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.

(i) ~~Three (3)~~ **Two (2)** HVLP chain on edge machines, designated as ~~COE-1,~~ COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. ~~COE-1 exhausts to two (2) stacks designated as S-12 and S-13.~~ COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.

(b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2).

Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating in pounds per gallon of solids delivered to any of the facilities listed above in

Section D.2 (DC-1, RCP, COE-3 and COE-4) and the facilities listed in Section D.1 (DC-2) and COE-5 listed in Section D.5 shall be limited to 85.5. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) The input of VOC to DC-1, RCP, COE-3, and COE-4 and the usage of cleanup solvent for DC-1, RCP, COE-3, and COE-4 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to 2564 tons used per twelve (12) consecutive months period. This limitation will prevent the VOC emissions from DC-1, RCP, COE-3, and COE-4 from being greater than 200 tons per twelve (12) consecutive month period. This limitation is based upon the use of a control device with an overall control efficiency of 92.2%.

(e) The input of VOC including cleanup solvent, minus the VOC solvent shipped out delivered to the applicators of SB-1, SB-2, SB-3 and SB-4 shall each be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

(f) The input VOC of ~~COE-1 and~~ DS-1 shall ~~each~~ be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

D.2.2 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facilities in Section D.2 (DC-1, DS-1, RCP, SB-1 - SB-4 ~~and COE-1,~~ COE-3 and COE-4), and Section D.4 (DG) shall be limited to less than 250 tons per twelve (12) consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) HVLP spray booths, the ~~three (3)~~ **two (2)** chain on edge machines and the ransburg coating process shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the four (4) HVLP spray booths (SB-1 - SB-4), the ~~three (3)~~ **two (2)** chain on edge machines (~~COE-1,~~ COE-3 and COE-4) and the ransburg coating process (RCP) are in operation.

D.2.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made

of the overspray from the surface coating booth stacks (S-1, S-2, S-6, S-10, S-11, ~~S-12, S-13,~~ and C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(l) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(m) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;

(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and

(3) Three (3) electric heaters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9][326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- **L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;**
- **D = Density of VOC in coating in pounds per gallon of VOC;**
- **E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 7.70.

(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- **V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.**
- **E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**
- **O = Equivalent overall efficiency of the capture system and control device as a percentage.**

The overall efficiency of the thermal oxidizer shall be greater than 88.6%.

D.7.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the two (2) chain on edge machines (COE-7 and COE-8) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is

complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.7.3 PSD Minor Limit [326 IAC 2-2]

(a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the two (2) chain on edge machines (COE-7 and COE-8) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities shall use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. Thus, the potential to emit VOC is limited to less than 40 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable.

(b) Any change or modification that increases the solids delivered to the applicators to 750 tons per twelve (12) consecutive month period or more shall increase the potential to emit PM_{10} to 15 tons per year, based on a transfer efficiency of 60% and a control efficiency of 95%, and shall require prior IDEM, OAQ, approval. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

D.7.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The Permittee shall operate the thermal oxidizer at all times when either of the two (2) chain on edge machines (COE-7 or COE-8) are in operation. This in conjunction with Condition D.7.1(d) shall make the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, not applicable pursuant to 326 IAC 2-4.1-1 and 40 CFR 63.41.

D.7.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing process shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.7.6 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.7.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40

CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.7.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.7.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.7.1, D.7.3 and D.7.4.

D.7.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per Conditions D.7.1 and D.7.3 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.7.11 VOC Emissions

Compliance with Condition D.7.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compounds emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)] + [uncontrolled VOC input]

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.7.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400?F. An hourly average temperature that is below 1400?F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1, D.7.3 and D.7.4, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.13 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1, D.7.3 and D.7.4, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation

of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.15 Record Keeping Requirements

(a) To document compliance with Conditions D.7.1 and D.7.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.7.1 and D.7.3.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The monthly cleanup solvent usage;

(4) The total VOC usage for each month;

(5) To document compliance with Condition D.7.12, the continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test; and

(6) To document compliance with Condition D.7.13, daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.7.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.7.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.16 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.7.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

D.7.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

A report form has been added to the permit.

Conclusion

(a) The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 069-18000-00018.

(b) The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 069-18038-00018.

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Ken-Koat, Inc.
Address City IN Zip: 1605 Riverfork Drive, Huntington, IN 46750
Significant Source Modification No.: 069-18000
Significant Permit Modification No.: 069-18038
Plt ID: 069-00018
Reviewer: CarrieAnn Paukowits
Date: September 18, 2003

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency	Material Substrate
Chain on Edge #7																		
Chemloc 205A	7.67	76.49%	0.0%	76.49%	0.0%	12.7%	0.0002951	1000	1.0	5.87	5.87	1.73	41.55	7.58	0.932	46.05	60%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.0002991	1000	1.0	6.71	6.71	2.01	48.17	8.79	0.000	n/a	60%	Metal
R-T-S	7.19	87.54%	0.00%	87.54%	0.0%	6.3%	0.0005941	1000	1.0	6.29	6.29	3.74	89.71	16.37	0.932	99.44	60%	Metal
Chemloc 253H	8.45	72.12%	0.0%	72.12%	0.0%	15.8%	0.001596	1000	1.0	6.09	6.09	9.72	233.37	42.59	6.586	38.62	60%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.000720	1000	1.0	7.25	7.25	5.22	125.22	22.85	0.000	n/a	60%	Metal
R-T-S	8.08	79.90%	0.00%	79.90%	0.0%	10.9%	0.002315	1000	1.0	6.45	6.45	14.9	358.58	65.44	6.586	59.34	60%	Metal
Chain on Edge #8																		
Chemloc 205A	7.67	76.49%	0.0%	76.49%	0.0%	12.7%	0.0002951	1000	1.0	5.87	5.87	1.73	41.55	7.58	0.932	46.05	60%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.0002991	1000	1.0	6.71	6.71	2.01	48.17	8.79	0.000	n/a	60%	Metal
R-T-S	7.19	87.54%	0.00%	87.54%	0.0%	6.3%	0.0005941	1000	1.0	6.29	6.29	3.74	89.71	16.37	0.932	99.44	60%	Metal
Chemloc 253H	8.45	72.12%	0.0%	72.12%	0.0%	15.8%	0.001596	1000	1.0	6.09	6.09	9.72	233.37	42.59	6.586	38.62	60%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.000720	1000	1.0	7.25	7.25	5.22	125.22	22.85	0.000	n/a	60%	Metal
R-T-S	8.08	79.90%	0.00%	79.90%	0.0%	10.9%	0.002315	1000	1.0	6.45	6.45	14.9	358.58	65.44	6.586	59.34	60%	Metal
											Control Efficiency:	88.6%	88.6%	88.6%	95.0%			
State Potential Emissions			**Add worst case coating to all solvents**								**TOTALS before controls:**	**37.4**	**897**	**164**	**15.0**			
											TOTALS after controls:	**4.26**	**102**	**18.7**	**0.752**			

METHODOLOGY

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb))/(Va+Vb)
RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb))/((Da*Va)+(Db*Vb))

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = RTS
Existing limitations in the Part 70 Operating Permit require a thermal oxidizer control efficiency of 92.2%. However, the control efficiency is ony required to be 88.6% for these facilties. Therefore, the emissions are calculated based on the 88.6% control efficiency.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Ken-Koat, Inc.
Address City IN Zip: 1605 Riverfork Drive, Huntington, IN 46750
Significant Source Modification No.: 069-18000
Significant Permit Modification No.: 069-18038
Plt ID: 069-00018
Reviewer: CarrieAnn Paukowits
Date: September 18, 2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MIBK	Weight % Formaldehyde	Weight % MEK	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylenes	Weight % Lead	Weight % Carbon Tetrachloride	MIBK Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylenes Emissions (ton/yr)	Lead Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Chain on Edge #7																				
Chemloc 205A	7.67	0.0002951	1000	75.00%	1.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.43	0.10	0.50	0.00	0.00	0.00	0.00	0.00	8.03
MEK	6.71	0.0002991	1000	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	8.79	0.00	0.00	0.00	0.00	0.00	8.79
Chemloc 253H	8.45	0.001596	1000	0.00%	0.00%	0.00%	5.00%	55.00%	20.00%	10.00%	1.00%	0.00	0.00	0.00	2.95	32.48	11.81	5.91	0.59	53.15
Toluene	7.25	0.000720	1000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	22.85	0.00	0.00	0.00	22.85
Chain on Edge #8																				
Chemloc 205A	7.67	0.0002951	1000	75.00%	1.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	7.43	0.10	0.50	0.00	0.00	0.00	0.00	0.00	8.03
MEK	6.71	0.0002991	1000	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	8.79	0.00	0.00	0.00	0.00	0.00	8.79
Chemloc 253H	8.45	0.001596	1000	0.00%	0.00%	0.00%	5.00%	55.00%	20.00%	10.00%	1.00%	0.00	0.00	0.00	2.95	32.48	11.81	5.91	0.59	53.15
Toluene	7.25	0.000720	1000	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	22.85	0.00	0.00	0.00	22.85
Total State Potential Emissions												**14.9**	**0.198**	**18.6**	**5.91**	**111**	**23.6**	**11.8**	**1.18**	**186**
												88.6%	88.6%	88.6%	88.6%	88.6%	88.6%	88.6%	88.6%	88.6%
METHODOLOGY												1.70	0.023	2.12	0.673	12.6	2.69	1.35	0.135	21.2

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Existing limitations in the Part 70 Operating Permit require a thermal oxidizer control efficiency of 92.2%. However, the control efficiency is ony required to be 88.6% for these facilties. Therefore, the emissions are calculated based on the 88.6% control efficiency.